

CORRESP. CONTROL
OUTGOING LTR NO.DOE ORDER # 4700.1
94 RF 06851

EG&G ROCKY FLATS, INC.

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July 1, 1994

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Jessie M. Roberson
Acting Assistant Manager for
Environmental Restoration
DOE/RFFO

INTERAGENCY AGREEMENT (IAG) MILESTONE EXTENSION REQUEST FOR THE INDUSTRIAL AREA INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA) – SGS-379-94

Refs: (a) M. S. Buddy ltr, MSB-027-94, to Steve Slaten, Proposed Actions of
the Industrial Area Interim Measures/Interim Remedial Action (IA
IM/IRA), June 6, 1994

(b) M. N. Silverman ltr (04763) to H. P. Mann, Authorization for Work
Involving the Pond Water Management Interim Measure/Interim Remedial
Action, May 10, 1994

Action: Request approval for extension of IAG milestone and proposal for resolution
meeting as soon as possible.

This letter is to update the status of the Industrial Area IM/IRA, to document progress
made, and to provide the basis for milestone extensions in accordance with discussions
and direction from the Department of Energy/Rocky Flats Field Office (DOE/RFFO), and
the regulatory agencies. We recommend submitting an extension request to the
regulatory agencies as soon as possible to avoid a violation of the terms of the IAG. The
basis for this extension request is the additional scope required to respond to agency
comments and for the addition of a milestone to develop a proposal for spill containment
tankage for the Sewage Treatment Plant (STP).

The Draft Industrial Area IM/IRA/Decision Document was submitted to the agencies for
review on March 15, 1994. This submittal was approximately two weeks ahead of the
March 23, 1994 IAG milestone. The majority of the technical comments received on this
document are minor and easily resolved. However, several comments are programmatic
in nature and require a much greater level of effort than anticipated to provide adequate
responses. A meeting with Frazer Lockhart of your staff, EG&G Rocky Flats Inc., and the
regulatory agencies took place on April 15, 1994, to determine the scope required for
the comment responses. It was determined at that meeting that the comment response
portion of the project would require a significant level of effort and that a new schedule
and extension request should be developed that reflects this level of effort.

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IN REPLY TO RFP CC NO:

ATTENTION ITEM STATUS
PARTIAL/OPEN

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LTR APPROVALS:

ORIG & TYPIST INITIALS

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The essence of the regulatory agencies' comments is the ability of the Decision Document to reflect a DOE/RFFO commitment to the actions proposed in the document. In order to develop a revised project schedule that allows the document revision necessary to reflect these commitments, it is first necessary to obtain DOE/RFFO buy-in to the proposed actions. In May, 1994, several briefings were made to DOE/RFFO upper management regarding the commitments of the Decision Document. These briefings were followed by a June 6, 1994 letter which outlined the proposed actions and estimated the costs associated with the actions. We anticipated that this letter would aid DOE/RFFO in its decision making regarding this project.

Notwithstanding the need for DOE/RFFO buy-in to the proposed actions in the Decision Document, EG&G Rocky Flats, Inc. is proceeding with the project, as directed in the April 15, 1994 meeting with DOE/RFFO and the agencies, by developing a revised project schedule, a limited implementation plan, a schedule for the proposed actions, and revising the document to reflect the comments. To date, editorial revisions to the document have been completed and a revised schedule has been developed.

Additionally, the May 10, 1994 letter from M. N. Silverman to H. P. Mann directed EG&G Rocky Flats, Inc. to add scope to the project by requiring the Industrial Area IM/IRA to include the proposal for the spill containment tankage as part of the STP upgrade. The referenced letter also asks EG&G Rocky Flats, Inc. to develop a proposal to negotiate an extension of the current dates for the Industrial Area IM/IRA with the regulators.

The above outlined activities have significantly increased the scope of the project and have placed the remaining project milestones in serious jeopardy. The following milestones are at risk:

Submittal of Draft Public Comment Responsiveness Summary	August 02, 1994
Submittal of Final Public Comment Responsiveness Summary	August 23, 1994
Submittal of Final Decision Document	August 23, 1994

Below are the proposed milestones that incorporate the additional project scope:

Submittal of Draft Public Comment Responsiveness Summary	December 1, 1994
Submittal of Final Public Comment Responsiveness Summary	January 9, 1995
Submittal of Final Decision Document	January 9, 1995

In accordance with the referenced DOE/RFFO request and cited discussions with the regulators, we recommend that DOE/RFFO seek milestone extensions relative to the proposed revised schedule as soon as possible. Attached is a draft extension request letter

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that outlines the basis for the request. We recommend formally transmitting this request to the regulatory agencies for their approval and proposing a resolution meeting to facilitate acceptance of the requested extension. Based on EG&G Rocky Flats, Inc. and DOE/RFFO discussions with the agencies in April, 1994, we anticipate the agencies to be receptive to this proposal.

If we can be of further assistance in this matter, please contact me or Mark Buddy of my staff at extension 8519.



S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc.

MSB:mrm

Orig. and 1 cc - J. M. Roberson

Attachment:
As Stated

cc:
F. R. Lockhart - DOE/RFFO
M. H. McBride - " "
M. N. Silverman - " "
L. W. Smith - " "

DRAFT

Date

Mr. Martin Hestmark
U.S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

The U. S. Department of Energy - Rocky Flats Field Office is formally requesting a schedule extension for the remaining Interagency Agreement (IAG) milestones for the Industrial Area Interim Measure/Interim Remedial Action Project. The project milestones are outlined in your August 10, 1993 to R. J. Schassburger. The first milestone, Submittal of the Draft IM/IRA/Decision Document - 3/23/94, was completed on 3/15/94 approximately two weeks ahead of schedule. The remaining milestones, Submittal of the Draft Responsiveness Summary - 8/2/94, Submittal of the Final Responsiveness Summary - 8/23/94, and Submittal of the Final IM/IRA Decision Document - 8/23/94, are all at risk and will require extensions. DOE-RFFO and EG&G project managers have kept their regulatory counterparts informed of the schedule difficulties, initially at a meeting held on April 15, 1994 at the offices of EPA. Several factors have combined to necessitate a revision to the project schedule.

Comments received by the agencies on the Draft Decision Document were well founded and extremely helpful. Most of the comments were easily addressed and quickly resolved. Editorial changes to the text have been completed based on these resolutions. However several comments had broader programmatic implications. Adequately addressing these comments will reflect a programmatic commitment to the actions proposed in the Decision Document. Responses to these comments will include the development of implementation plans and schedules for the proposed actions, development of statistical methodology for establishing baseline conditions and environmental action levels during D&D activities, development of response action process flow diagrams, refinement of the COC selection methodology, a more complete administrative linkage to the D&D process, and more complete definition of acceptance criteria for the existing on-site water treatment facilities. The addition and further refinement of the above elements will result in a much more complete and useful document. However the level of effort required to develop and complete these comment responses is much greater than what had been previously anticipated.

The Executive Committee in their April 15, 1994 dispute resolution designated the IM/IRA/DD to carry the milestone for completion of the Sewage Treatment Tank Upgrade Influent/Effluent

Gary Baughman
Martin Hestmark
Date
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Storage. Inclusion of this milestone was not anticipated in the original scope of the project. It is anticipated that the Final Decision Document will include a subproject description, scope, implementation plan, and schedule. Development of this information is being performed under the comment response task. This activity requires an additional level of effort that was not previously anticipated.

As the document developed, its scope became much more global and it enveloped several on site programs in addition to the Environmental Restoration Program. This has necessitated the need to coordinate much more closely with the other programs at RFP. The extensive coordination effort was not anticipated in the original project scope and schedule. This coordination effort becomes critical to the ability of DOE to provide the programmatic commitments to the actions proposed in the Decision Document.

The above factors combine to constitute "good cause" under IAG PART 42, EXTENSIONS, and it is on this basis that the DOE requests the following extensions:

Submittal of Draft Public Comment Responsiveness Summary	December 1, 1994
Submittal of Final Public Comment Responsiveness Summary	January 9, 1995
Submittal of Final Decision Document	January 9, 1995

As you know this project committed to a very aggressive schedule. By working together we were able to meet the first project milestone. Review of the Draft Decision Document has provided all parties the opportunity to improve and refine the scope and objectives of this project. DOE would like to use this opportunity to continue our commitment to making this project a success and producing a product that we can all be proud of.

We welcome the opportunity for further discussions in this matter. If you have any questions, or require further information, please contact Regina Sarter of my staff at 966-7252.

Sincerely,

Jesse Roberson
Acting Assistant Manager for
Environmental Restoration
DOE/RFFO